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CHEVRON CORPORATION

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

In re Application of  
CHEVRON CORPORATION, a Delaware  
corporation,

Applicant,

E-TECH INTERNATIONAL, a New Mexico  
organization, and WILLIAM POWERS, an  
individual,

Respondents.

CASE NO. 10-cv-01146 IEG (WMC)

**REQUEST FOR LIFTING OF  
PROTECTIVE ORDER**

NO HEARING REQUEST

1 On September 2, 2010, this Court entered a temporary protective order, ordering that the  
2 documents and deposition transcript produced in this case be “treat[ed] . . . as subject to a protective  
3 order” “for the time being” and requested that the parties “not disseminate [the documents and  
4 testimony” except to the Ecuadorian court,” in order to allow the District Court to consider Plaintiffs’  
5 Motion for Stay and Request for Review. (Dkt. 47, 55 at 18:3-15.) The District Court has now  
6 considered Plaintiffs’ Motion to Stay and lifted the stay. (Dkt. 58.) The Ninth Circuit has likewise  
7 declined to stay discovery in this proceeding. Order, *Chevron Corp. v. William Powers and E-Tech*  
8 *Int’l*, No. 10-56410 (9th Cir. Sept. 9, 2010). In addition, the District Court has received complete  
9 briefing from the parties on Plaintiffs’ Request for Review and Respondent Powers has now produced  
10 documents and will sit for deposition tomorrow, September 10, 2010. As Plaintiffs have sought and  
11 obtained review by the District Court, no further purpose is served by a temporary protective order.  
12 Chevron thus requests that the temporary protective order be lifted by this Court *sua sponte* at this  
13 time. Counsel for Chevron contacted counsel for Plaintiffs and Respondents by e-mail today to ask if  
14 they oppose the lifting of the protective order. As of the time of this filing, no response has been  
15 received.

16 Chevron brings this to the Court’s attention today due to pressing deadlines in related  
17 Section 1782 proceedings. In the course of Chevron’s review of Respondent Powers’ production,  
18 Chevron has obtained critical evidence relating to the witnesses in related Section 1782 proceedings—  
19 specifically, *In re Applic. of Chevron Corp.*, No. 3:10-cv-00686 (M.D. Tenn.) and *In re Applic. of*  
20 *Chevron Corp.*, No. 10mc21 (D.N.M.)—that provide additional details regarding these witnesses’  
21 involvement in the ghostwriting of the Cabrera Report and Plaintiffs’ efforts to corrupt the Lago Agrio  
22 Litigation. Chevron faces a Friday, September 10, 2010 deadline for the submission of briefing and  
23 evidence in support of pending motions in these proceedings, specifically a Motion to Compel and a  
24 response to Rule 72 objections, and needs to use Respondent Powers’ documents as evidence in those  
25 proceedings.

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1 Therefore, Chevron respectfully requests that this Court enter an order lifting the temporary  
2 protective order.

3 DATED: September 9, 2010

Respectfully submitted,

4  
5 /s/ Andrea E. Neuman

Andrea E. Neuman, Esq.

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**CERTIFICATE OF SERVICE**

[X] **(BY Electronic Transfer to the CM/ECF System)** In accordance with Federal Rules of Civil Procedure 5(d)(3), Local Rule 5-4, and General Order 07-08, I uploaded via electronic transfer a true and correct copy scanned in an electronic file in Adobe "pdf" format of the above-listed documents to the United States District Court Central District of California's Case Management and Electronic Case Filing (CM/ECF) system on this date. It is my understanding that by transmitting these documents to the CM/ECF system, they will be served on all parties of record according to the preferences chose by those parties within the CM/ECF system. The transmission was reported as complete and without error.

DATED: September 9, 2010

Respectfully submitted,

/s/

Andrea E. Neuman, Esq.

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